

Exhibit D to Ferber Declaration
Part 2

1 ANDERSON

2 talked about it like at least once or
3 twice a year to different people and
4 tried to get their opinion on whether I
5 should write it or not, and a few people
6 said, you know, no, because the guys were
7 going through appeals and it might
8 incriminate some people, so I kind of
9 held off on it until I'd say around '98.

10 In around '98 I spoke with
11 Damon about him actually playing the AJ
12 role and described the whole little
13 Junior Black Mafia scenario. And I asked
14 him 'cause he has kind of the swagger and
15 the arrogance of a Aaron Jones and sort
16 of resembled him, and I said that, you
17 know, he should play the character.

18 Q. Okay. So let's try to see
19 if we can fix some dates.

20 If you look at the second
21 page of the treatment, which is Exhibit
22 4, do you see at the bottom it says
23 9-17-98, first draft?

24 A. Yes.

25 Q. Is that the date on which

1 ANDERSON

2 you completed the first draft?

3 A. Yes.

4 Q. Do you recall when you
5 started writing the first draft?

6 A. Yes.

7 Q. When did you start writing
8 it?

9 A. Around July.

10 Q. Around July of 1997?

11 A. 1998.

12 Q. Excuse me, 1998?

13 A. Yeah, yeah.

14 Q. And how do you recall that
15 it was around July of 1998 that you
16 started writing it?

17 A. It was around my birthday,
18 and I remember I had met with a friend of
19 mine. His name was Mark Lamar, and he
20 was saying that he knew somebody -- I was
21 telling him about the idea, and he said
22 that he knew somebody that would fund the
23 movie if I came up with a treatment, and
24 I figured -- then I started writing
25 around my birthday, and hopefully I be

1 ANDERSON

2 Down or Lay Down?

3 A. No.

4 Q. So you wrote these on spec?

5 A. Yes.

6 Q. Okay. Turn to Exhibit 4
7 which is the treatment for Junior Black
8 Mob, and go to I guess the fourth page,
9 but I guess it's page 2, the second page
10 with text on it; do you see that?

11 A. Right.

12 Q. The last full paragraph at
13 the bottom of that page which begins with
14 "JBM was set up like the military and
15 divided into sections."

16 A. Okay, yes.

17 Q. Was that based on any
18 factual circumstances?

19 MR. WOTORSON: Objection to
20 form.

21 BY MR. FERBER:

22 Q. What was that based on, sir?

23 A. It was the way it was set
24 up, the organization.

25 Q. How did you come to know

1 ANDERSON

2 that?

3 A. Because I knew guys who
4 headed the southwest division, the
5 southwest, west Philly division, I knew
6 guys that were in the Mount Airy
7 division, and I knew guys that were in
8 the south Philadelphia division and I
9 knew guys that were in the north
10 Philadelphia division.

11 Q. Turn to page 3 please.

12 A. Okay.

13 Q. The second sentence on page
14 3 says, "approximately in June 1987, Baby
15 Boy and D-nise would and did travel to
16 Florida for the purpose of picking up 10
17 kilograms of cocaine from their Florida
18 connect;" do you see that?

19 A. Yes.

20 Q. Is that based on anything?

21 A. Yeah.

22 Q. What is that based on?

23 A. It was a indictment that I
24 used to reference by times and that was
25 it. Like it just -- that's the way it

1 ANDERSON

2 read; in approximately June 1987, I
3 changed names and did travel to Florida
4 for the purpose of picking up -- the
5 number I'm not sure of. I don't think
6 that was in there, kilograms of cocaine
7 from their Florida connect.

8 Q. What is the indictment to
9 which you're referring?

10 A. A friend of mine sent me a
11 copy of a indictment from his cellmate, a
12 guy named Black.

13 Q. Who was Black, the friend or
14 the cellmate?

15 A. The cellmate.

16 Q. Do you remember the rest of
17 his name?

18 A. If he said it, I would
19 probably remember it, but it was
20 something Brown.

21 Q. So Black was a nickname?

22 A. Yeah.

23 Q. Are you saying his actual
24 name was Brown?

25 A. Samuel Brown, I believe.

1 ANDERSON

2 Q. It was Samuel Brown?

3 A. Yeah.

4 Q. And you knew Samuel Brown's
5 cellmate; is that what you're saying,
6 sir?

7 A. Yes.

8 Q. Who was the cellmate who you
9 knew?

10 A. Thomas Lawson.

11 Q. And I just want to be clear.
12 Mr. Lawson was someone you
13 knew?

14 A. Yes.

15 Q. And he sent you a copy of an
16 indictment?

17 A. Yes.

18 Q. Was it more than one
19 indictment?

20 A. Just one indictment for
21 Black, but it had everybody else in it,
22 and, you know, like the surveillances and
23 all that kind of stuff. And like I said,
24 I used that to reference like some of the
25 terms that they would use and like some

1 ANDERSON

2 of the actual like places they would go.
3 But once like when they went to Florida,
4 that's where I stopped it and I took what
5 I knew and went on with the story from
6 there.

7 Q. Do you recall how many pages
8 this indictment was?

9 A. It was about a script long,
10 about a hundred pages.

11 Q. Do you recall from what
12 state the indictment issued or whether it
13 was a federal indictment?

14 A. It was a federal indictment.

15 Q. And do you recall from which
16 state the federal indictment had issued?

17 A. Yeah, it was Pennsylvania.

18 Q. And did it involve the
19 Junior Black Mob?

20 A. Yes.

21 Q. It did?

22 A. Yes.

23 Q. Do you still have that
24 indictment?

25 A. No, I don't know where that

1 ANDERSON

2 A. No.

3 Q. On page 3 of Exhibit 4 that
4 first full paragraph that begins with
5 Baby Boy and D-nise drove down to
6 Florida; do you see that?

7 A. Yes.

8 Q. The last two sentences say
9 "The runners are led to a warehouse, here
10 they drop off a briefcase carrying one
11 hundred thousand dollars and get a
12 shopping bag containing 10 kilograms of
13 cocaine."

14 Was that based on anything
15 you had read or been told?

16 MR. WOTORSON: Objection to
17 form.

18 BY MR. FERBER:

19 Q. What, if anything, was that
20 based on?

21 A. I'm not sure of the numbers.
22 Again, I think I may have changed the
23 numbers to make it more, you know, to
24 seem like a bigger deal than it actually
25 was. It may have been a lesser amount,

1 ANDERSON

2 but it came from, you know, the
3 indictment.

4 Q. What did you say the real
5 Boss's name was?

6 A. Which one?

7 Q. Did you say Craig Haynes?

8 A. Craig Haynes.

9 Q. Because I was just looking
10 at page 5 and I see it says Ronald Boss
11 Gaynes.

12 A. Yeah, I changed it.

13 Q. Just a little bit?

14 A. Yeah.

15 Q. Okay. What, if anything, is
16 the motto Get Down or Lay down based on?

17 A. It's just something that
18 they would tell people that they, you
19 know, wanted to be a part of the
20 organization. You know, either you get
21 down with us or you lay down.

22 Q. And you're referring to the
23 Junior Black Mafia?

24 A. Yes.

25 Q. By the way, was there a

1 ANDERSON

2 separate organization to the best of your
3 knowledge known as the Philly or
4 Philadelphia Black Mafia?

5 A. The organizations that were
6 named -- that really had a name in
7 Philadelphia were Black Incorporated,
8 which was older Mafia type guys who was
9 like back in the 70's, late 60's, early
10 70's, and JBM.

11 Q. JBM is Junior Black Mafia?

12 A. Yeah, or they tried to cover
13 it and say Just Blow Up Money, but it was
14 Junior Black Mafia.

15 Q. Are you saying that they
16 were also known by the initials JBM?

17 A. Are you talking about the
18 older group?

19 Q. No, the Junior Black Mafia.

20 A. Yeah. They had rings and
21 tire covers on the back of their Jeeps
22 that said JBM.

23 Q. What are the tire covers to
24 when you're referring?

25 A. Like the older model

1 ANDERSON

2 Pathfinders that had the tire cover on
3 the rear and they had the tire cover that
4 said JBM on it.

5 Q. And what are the rings to
6 which you were referring?

7 A. This was just an induction
8 type of thing like where all of the
9 captains of each part of the city had.
10 They had a party where they gave -- where
11 AJ gave 'em all rings, and this party was
12 up in West Oak Lane.

13 Q. Mr. Anderson, do you recall
14 looking at Exhibit 4 the treatment for
15 Junior Black Mob, do you recall what you
16 wrote it on? What kind of equipment you
17 used?

18 A. Yeah, I used a old laptop
19 that Will had gave me.

20 Q. And how about Exhibit 5, the
21 full screenplay Get Down or Lay Down
22 Junior Black Mob?

23 A. The same.

24 Q. Do you still have that old
25 laptop?

1 ANDERSON

2 A. It looked like the poster.
3 I think it had like strings of something
4 like in the Godfather type of family
5 thing.

6 Q. Was it bound?

7 A. I don't know. It was a
8 book. I guess it was.

9 Q. So it was in the form of a
10 book?

11 A. Yeah.

12 Q. It wasn't in the form of a
13 bunch of loose pages?

14 A. No.

15 Q. Where in Mr. Dash's office
16 was the book?

17 A. Just sitting on the desk.

18 Q. And have you said everything
19 that you recall about your conversation
20 with him about it?

21 A. Yeah, it wasn't no
22 conversation. I said how was, and he was
23 like, it wasn't nothing.

24 Q. Did you pick up the book?

25 A. No.

1 ANDERSON

2 Q. Other than seeing the book
3 on Mr. Dash's desk on that occasion,
4 when, if ever, did you next see the book?

5 A. I never saw the book.

6 Q. Okay. Did you have any
7 understanding as to what the content of
8 the book was?

9 A. No.

10 MR. FERBER: Let's mark this
11 Anderson 7.

12 (Copyright of The Family
13 received and marked as Exhibit 7
14 for Identification.)

15 BY MR. FERBER:

16 Q. Obviously this is a rather
17 long exhibit, but we are looking at the
18 second page. The first page is simply a
19 letter from the copyright office, and the
20 second page is a photocopy of a cover.

21 A. Huh-huh.

22 Q. Have you seen that cover
23 before?

24 A. No.

25 Q. Have you ever read The

1 ANDERSON

2 Family?

3 A. Never.

4 Q. Before the occasion in the
5 barbershop where Mr. Jones congratulated
6 you, had anyone ever told you anything
7 about him?

8 A. No. I found out after, you
9 know, I'm like who's the dude, they were
10 like he's the one who wrote that book.

11 Q. Have you told me the extent
12 of your conversation with him on that
13 occasion in the barbershop?

14 A. Right.

15 Q. Do you know somebody known
16 by the name of Wongus, W-o-n-g-u-s?

17 A. Wongus.

18 Q. Who is Wongus?

19 A. He's a friend of mine.

20 Q. Is that his real name?

21 A. I don't know what his real
22 name is.

23 Q. How do you know Wongus?

24 A. Being on the radio and a
25 couple friends of mine. He related --

1 ANDERSON

2 he's related to a friend of mine.

3 Q. Have you ever talked to
4 Wongus about State Property?

5 A. No, no.

6 Q. After that first time you
7 met Mr. Jones in the barbershop, have you
8 ever spoken with him since?

9 A. Yeah, when he came over my
10 house last year.

11 Q. When last year?

12 A. Around February or March of
13 last year.

14 Q. Do you have an understanding
15 or recollection as to what led him coming
16 to your house?

17 A. He said he wanted to talk to
18 me.

19 Q. How did he -- did he call
20 you in advance?

21 A. Yeah, he did.

22 Q. And what did he say when he
23 called you?

24 A. He said I got something I
25 want to talk to you about this case I got

1 ANDERSON

2 with Roc-A-Fella and Jay Z and them.

3 Q. Did he tell you anything
4 else on the phone before he came up to
5 see you?

6 A. I don't think so.

7 Q. And how long after he called
8 you did he come up to see you?

9 A. It may have been a couple
10 days. He called me the day of that he
11 was on his way up, he got directions.

12 Q. At which house did he see
13 you?

14 A. 77th Avenue.

15 Q. Whose house was that?

16 A. That was my house at the
17 time.

18 Q. And he did come to see you?

19 A. Yes.

20 Q. How long was he there for?

21 A. About a hour.

22 Q. What do you recall about
23 that meeting on that occasion?

24 A. Well, he told me about the
25 lawsuit. He knew I had a -- he knew I

1 ANDERSON

2 was mad at Damon about not getting no
3 back-end, and he wanted me to come
4 onboard with him to file suit after
5 Damon, to sign a affidavit.

6 Q. What was the affidavit he
7 wanted you to sign?

8 A. I never read the affidavit.

9 Q. Did you have an understand
10 as to --

11 A. But he said, you know, he
12 wanted me to sign the affidavit. He
13 would get his lawyer to send me over the
14 affidavit and that it would be, you know,
15 kind of a open and shut case if I was to
16 say that Damon told me to copy it from --
17 you know, told me to copy the screenplay
18 from the book. And I'm like, I never
19 read the book and Damon never told me
20 that.

21 You know, so he was like,
22 well, you know, if you come onboard,
23 then, you know, he offered me a
24 percentage of what we were gonna win. So
25 I was like, you know, I got to kind a

ANDERSON

think about it, I'm not sure, I don't know if I want to purger myself.

And I also had other problems with the fact that I had just recently directed a movie and it had Roc-A-Fella artists, and I was kind of needing their help to market the movie, so I was like no, I don't know if I will, I got to think about it, you know. It sounded tempting, but, you know, I told him I needed time to think about it.

So then we met down at my mother's, and, you know, from the point where he left my house on 77th Avenue, he would like call me and try to set up another meeting to ask me did I get the affidavit, did I get my lawyer to look at it, you know, all that kind of stuff.

Q. How long after the first meeting did he call you to ask whether you got the affidavit?

A. He called me that day to see if I got it.

Q. How long after the first

1 ANDERSON

2 meeting were you sent an affidavit?

3 A. It wasn't long. It was a
4 couple hours maybe I think.

5 Q. A couple of hours?

6 A. Yeah.

7 Q. And you got call from him
8 that same day?

9 A. Yeah.

10 Q. Had you read the affidavit?

11 A. I never read it.

12 Q. And when he called you and
13 asked you whether you had received the
14 affidavit, what did you say to him?

15 A. I was like yeah, I received
16 it, and then I told him that I would have
17 my lawyer look over it and that I would
18 get back to him with a answer. So, you
19 know, then he would text me and say are
20 you gonna get onboard with us and all
21 that stuff like that.

22 He would -- you know, he was
23 telling me about how good his lawyers
24 were, and, you know, and I think he
25 arranged a conversation for me to speak

1 ANDERSON

2 with one of his lawyers.

3 Q. When you told him that you
4 never read the book, do you recall what
5 he said in response, if anything?

6 A. He just talked around it.

7 Q. You said something about not
8 wanting to purger yourself.

9 When you spoke to him, did
10 you ever use a reference to not wanting
11 to purger yourself?

12 A. Yes.

13 Q. What did you say to him?

14 A. I said man, I don't know if
15 I'm mad enough at Damon to purger myself,
16 and he said that I wouldn't have to
17 testify, and it's not gonna go to court.
18 If I sign the affidavit, it would be
19 pretty much a open and shut case.

20 Q. So he explained why you
21 wouldn't have to testify and wouldn't
22 have to go to court?

23 A. Yeah, he said it would a
24 open and shut case.

25 Q. Did he or anybody else ever